

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

LISA DOLAN COYLE
3120 Maureen Drive
Philadelphia, PA 19154

Plaintiff,

v.

AMERCO, t/a Republic Western Insurance Company
1 Ivybrook Boulevard Suite 160
Ivyland, PA 18974

JAMES WALLETE,

Defendants

JURY TRIAL DEMANDED

Civil Action No. 02-CV-3619

**MEMORANDUM OF LAW IN SUPPORT OF PLAINTIFF COUNSEL'S
PETITION FOR LEAVE TO WITHDRAW AS COUNSEL**

Linda P. Falcao, Esq., and Linda P. Falcao, Esq., PC, hereby petition for leave of Court to withdraw as counsel for plaintiff in the above matter, for the reasons set forth in the attached Petition.

Good cause exists for counsel's withdrawal, and in fact, counsel is required to withdraw, where a client desires new representation. Pennsylvania Code of Professional Conduct, Rule 1.16(a)(3); U.S. v. Thomas, 450 F.2d 1355 (D.C.Cir. 1971); McDonnell v. Tabah, 297 F.2d 731 (2d Cir. 1961). Good cause is additionally shown where continued representation of a party will impose a significant financial burden on counsel due to the party's financial obligations to counsel, or where the party and his counsel have developed substantial disagreements about the strategy of the case. Pennsylvania Code of Professional Conduct, Rule 1.16(b)(4); Reynolds v. Driscoll Machinery, Inc., 1991 US Dist LEXIS 12478 (EDPA 1991). In addition, because there

are no current deadlines in this matter, plaintiff has ample opportunity to obtain new counsel as she desires.

Undersigned counsel respectfully requests that this Court grant counsel's petition and enter an order in the form attached hereto.

Respectfully submitted,

Linda P. Falcao
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DATE: